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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR- 16-508-EMC
)
Plaintiff,)
)
v.)
)
KRISHA VIRAMONTES,)
)
Defendant.)

UNITED STATES OF AMERICA,) NO. CR-16-531-EMC
)
Plaintiff,) ~~PROPOSED~~ ORDER EXCLUDING TIME FROM
) ICP WCT['33.'4239"TO OCTEJ '3.'4239
v.)
)
CHRISTOPHER KINNEY,)
)
Defendant.)

STIPULATION

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The parties appeared before the Court on January 11, 2017 at 2:30 p.m. for a status conference. Defendant Krishna Viramontes, represented by Geoffrey Hansen, was present and in custody. Defendant Christopher Kinney, represented by Gail Shifman, was present and in custody. Assistant United States Attorneys Michael Maffei and Karen Kreuzkamp appeared for the Government. The Court, after hearing the status in this case, scheduled a further status hearing for March 1, 2017, the date proposed by counsel.

2. The Court so scheduled the status hearing with the understanding that the parties would submit a Stipulation and Proposed Order excluding time.

3. The parties now formalize their request for a continuance of this matter to March 1, 2017 at 2:30 p.m. for a further status hearing, and respectfully submit and agree that the period from January 11, 2017 through and including March 1, 2017 should be excluded from the otherwise applicable Speedy Trial Act computation because the continuance is necessary for effective preparation of counsel, taking into account the exercise of due diligence. Specifically, the time requested for exclusion will allow counsel for the defendants to review the discovery in this case.

IT IS SO STIPULATED.

DATED: January 12, 2017

BRIAN J. STRETCH
United States Attorney

/s/

MICHAEL MAFFEI
KAREN KREUZKAMP
Assistant United States Attorneys

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1 DATED: January 12, 2017

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3 /s/
4 GEOFFREY HANSEN
5 Counsel for Defendant
6 Krisha Viramontes

7 DATED: January 12, 2017

8 /s/
9 GAIL SHIFMAN
10 Counsel for Defendant
11 Christopher Kinney

12 **~~PROPOSED~~ ORDER**

13 Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice
14 served by granting a continuance January 11, 2017 through and including March 1, 2017 outweigh the
15 best interest of the public and the defendants in a speedy trial, and that failure to grant such a
16 continuance would unreasonably deny the defendants the reasonable time necessary for effective
17 preparation, taking into account the exercise of due diligence.


18 Accordingly, THE COURT ORDERS THAT:

19 1. The parties shall appear before the Court on Monday, March 1, 2017 at 2:30 p.m. for a
20 status conference.

21 2. The period from January 11, 2017 through and including March 1, 2017 is excluded from
22 the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) &
23 (B)(iv).

24 IT IS SO ORDERED.

25 DATED: 1/12/2017

26 
27 HON. EDWARD M. CHEN
28 United States Senior District Judge